

EXHIBIT 1

EXHIBIT 1

Assigned for all purposes to: Spring Street Courthouse, Judicial Officer: Michael Whitaker
Electronically FILED by Superior Court of California, County of Los Angeles on 03/30/2022 02:02 PM Sherri R. Carter, Executive Officer/Clerk of Court, by H. Flores-Hernandez, Deputy Clerk

<div>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Matthew Taylor, Esq. (SBN 252556); Karan S. Gill, Esq. (SBN 304055) VAZIRI LAW GROUP, APC. 5757 Wilshire Blvd, Ste. 670 Los Angeles, CA 90036 TELEPHONE NO: 310-777-7540 FAX NO. (Optional): 310-777-0373 E-MAIL ADDRESS (Optional): mtaylor@vazirilaw.com; kgill@vazirilaw.com ATTORNEY FOR (Name): Plaintiff, Sally Meza</div>		<div>FOR COURT USE ONLY</div>
<div>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 312 N. Spring St. MAILING ADDRESS: 312 N. Spring St. CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Spring Street Courthouse</div>		
<div>PLAINTIFF: Sally Meza DEFENDANT: Extended Stay America, Inc.</div>		
<div><input checked="" type="checkbox"/> DOES 1 TO 25 inclusive</div>		
<div>COMPLAINT—Personal Injury, Property Damage, Wrongful Death <input type="checkbox"/> AMENDED (Number): Type (check all that apply): <input type="checkbox"/> MOTOR VEHICLE <input checked="" type="checkbox"/> OTHER (specify): Premises Liability <input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Other Damages (specify):</div>		<div>CASE NUMBER: 22STCV10876</div>
<div>Jurisdiction (check all that apply): <input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000 <input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited</div>		

1. **Plaintiff** (name or names): Sally Meza
alleges causes of action against **defendant** (name or names):
Extended Stay America, Inc., and Does 1 to 25 inclusive
2. This pleading, including attachments and exhibits, consists of the following number of pages: 5
3. Each plaintiff named above is a competent adult
- a. ☐ **except** plaintiff (name):
- (1) ☐ a corporation qualified to do business in California
- (2) ☐ an unincorporated entity (describe):
- (3) ☐ a public entity (describe):
- (4) ☐ a minor ☐ an adult
- (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
- (b) ☐ other (specify):
- (5) ☐ other (specify):
- b. ☐ **except** plaintiff (name):
- (1) ☐ a corporation qualified to do business in California
- (2) ☐ an unincorporated entity (describe):
- (3) ☐ a public entity (describe):
- (4) ☐ a minor ☐ an adult
- (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
- (b) ☐ other (specify):
- (5) ☐ other (specify):

☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

SHORT TITLE: Meza v. Extended Stay America, Inc., et al.	CASE NUMBER:
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4. ☐ Plaintiff (*name*):
is doing business under the fictitious name (*specify*):

and has complied with the fictitious business name laws.
5. Each defendant named above is a natural person
- a. ☒ **except** defendant (*name*): Extended Stay America, Inc.c. ☐ **except** defendant (*name*):
- (1) ☐ a business organization, form unknown (1) ☐ a business organization, form unknown
(2) ☒ a corporation (2) ☐ a corporation
(3) ☐ an unincorporated entity (*describe*): (3) ☐ an unincorporated entity (*describe*):

(4) ☐ a public entity (*describe*): (4) ☐ a public entity (*describe*):
(5) ☐ other (*specify*): (5) ☐ other (*specify*):
- b. ☐ **except** defendant (*name*):
- (1) ☐ a business organization, form unknown (1) ☐ a business organization, form unknown
(2) ☐ a corporation (2) ☐ a corporation
(3) ☐ an unincorporated entity (*describe*): (3) ☐ an unincorporated entity (*describe*):

(4) ☐ a public entity (*describe*): (4) ☐ a public entity (*describe*):
(5) ☐ other (*specify*): (5) ☐ other (*specify*):
- d. ☐ **except** defendant (*name*):
- (1) ☐ a business organization, form unknown (1) ☐ a business organization, form unknown
(2) ☐ a corporation (2) ☐ a corporation
(3) ☐ an unincorporated entity (*describe*): (3) ☐ an unincorporated entity (*describe*):

(4) ☐ a public entity (*describe*): (4) ☐ a public entity (*describe*):
(5) ☐ other (*specify*): (5) ☐ other (*specify*):
- ☐ Information about additional defendants who are not natural persons is contained in Attachment 5.
6. The true names of defendants sued as Does are unknown to plaintiff.
- a. ☒ Doe defendants (*specify Doe numbers*): 1 to 25 were the agents or employees of other named defendants and acted within the scope of that agency or employment.
- b. ☒ Doe defendants (*specify Doe numbers*): 1 to 25 are persons whose capacities are unknown to plaintiff.
7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (*names*):
8. This court is the proper court because
- a. ☒ at least one defendant now resides in its jurisdictional area.
b. ☒ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.
c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.
d. ☐ other (*specify*):
9. ☐ Plaintiff is required to comply with a claims statute, **and**
- a. ☐ has complied with applicable claims statutes, **or**
b. ☐ is excused from complying because (*specify*):

SHORT TITLE:

CASE NUMBER:

Meza v. Extended Stay America, Inc., et al.

10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):
- a. ☐ Motor Vehicle
 - b. ☒ General Negligence
 - c. ☐ Intentional Tort
 - d. ☐ Products Liability
 - e. ☒ Premises Liability
 - f. ☐ Other (*specify*):

11. Plaintiff has suffered
- a. ☒ wage loss
 - b. ☒ loss of use of property
 - c. ☒ hospital and medical expenses
 - d. ☒ general damage
 - e. ☒ property damage
 - f. ☒ loss of earning capacity
 - g. ☒ other damage (*specify*):

Future medical expenses; future pain and suffering

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are
- a. ☐ listed in Attachment 12.
 - b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. **Plaintiff prays** for judgment for costs of suit; for such relief as is fair, just, and equitable; and for
- a. (1) ☒ compensatory damages
 - (2) ☐ punitive damages
- The amount of damages is (*in cases for personal injury or wrongful death, you must check (1)*):
- (1) ☒ according to proof
 - (2) ☐ in the amount of: \$

15. ☒ The paragraphs of this complaint alleged on information and belief are as follows (*specify paragraph numbers*):
- Prem.L-1, Prem.L-2, Prem.L-3, Prem.L-4 ,Prem.L-5 and GN-1

Date: March 30, 2022

Karan S. Gill, Esq.

(TYPE OR PRINT NAME)



/s/ Karan S. Gill

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE:

Meza v. Extended Stay America, Inc., et al.

CASE NUMBER:

First

(number)

CAUSE OF ACTION—Premises Liability

Page 4

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

Prem.L-1. Plaintiff (name): Sally Meza

alleges the acts of defendants were the legal (proximate) cause of damages to plaintiff.

On (date): September 18, 2020

plaintiff was injured on the following premises in the following

fashion (description of premises and circumstances of injury):

DEFENDANT(S) negligently maintained the premises at or near 601 W Bonita Ave, San Dimas, CA 91773 such that they allowed a dimly lit uneven pavement to exist on the premises thereby causing Plaintiff to fall and sustain injury. DEFENDANT(S) failed to adequately inspect, maintain and/or make their premises reasonably safe. DEFENDANT(S) knew or should have known of the dangerous condition(s) prior to Plaintiff's fall, but failed to take any action to repair it or warn Plaintiff thereof. Plaintiff fell from the dangerous condition(s) causing severe and permanent injuries.

Prem.L-2. ☒ **Count One—Negligence** The defendants who negligently owned, maintained, managed and operated the described premises were (names):

Extended Stay America, Inc., and

☒ Does 1 to 25

Prem.L-3. ☒ **Count Two—Willful Failure to Warn** [Civil Code section 846] The defendant owners who willfully or maliciously failed to guard or warn against a dangerous condition, use, structure, or activity were (names):

Extended Stay America, Inc.

☐ Does _____ to _____Plaintiff, a recreational user, was ☐ an invited guest ☐ a paying guest.

Prem.L-4. ☐ **Count Three—Dangerous Condition of Public Property** The defendants who owned public property on which a dangerous condition existed were (names):

☐ Does _____ to _____

a. ☐ The defendant public entity had ☐ actual ☐ constructive notice of the existence of the dangerous condition in sufficient time prior to the injury to have corrected it.

b. ☐ The condition was created by employees of the defendant public entity.

Prem.L-5. a. ☒ **Allegations about Other Defendants** The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names):

☒ Does 1 to 25

b. ☐ The defendants who are liable to plaintiffs for other reasons and the reasons for their liability are ☐ described in attachment Prem.L-5.b ☐ as follows (names):

SHORT TITLE: Meza v. Extended Stay America, Inc., et al.	CASE NUMBER:
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Second _____ **CAUSE OF ACTION—General Negligence** Page 5
(number)

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): Sally Meza

alleges that defendant (name): Extended Stay America, Inc., and

☒ Does 1 to 25

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): September 18, 2020

at (place): Extended Stay America, Inc., 601 W Bonita Ave, San Dimas, CA 91773

(description of reasons for liability):

DEFENDANT(S) negligently maintained the premises at or near 601 W Bonita Ave, San Dimas, CA 91773 such that they allowed a dimly lit uneven pavement to exist on the premises thereby causing Plaintiff to fall and sustain injury. DEFENDANT(S) failed to adequately inspect, maintain and/or make their premises reasonably safe. DEFENDANT(S) knew or should have known of the dangerous condition(s) prior to Plaintiffs fall, but failed to take any action to repair it or warn Plaintiff thereof. Plaintiff fell from the dangerous condition(s) causing severe and permanent injuries.